



**MEMO ENDORSED**

Seyfarth Shaw LLP  
620 Eighth Avenue  
New York, New York 10018  
T (212) 218-5500  
F (212) 218-5526  
jyu@seyfarth.com  
T (212) 218-5524  
www.seyfarth.com

December 1, 2019

**VIA ECF**

Hon. Denise L. Cote, U.S.D.J.  
U.S. District Court for the Southern District of New York

Re: Kelley-Hilton v. Sterling Infosystems Inc.  
Civil Action No 19-cv-09963 (S.D.N.Y.)

*Granted.*  
*James S. Yu*  
*12/4/19*

Dear Judge Cote:

In accordance with Rule 4.A. of Your Honor's individual practice rules, defendant Sterling Infosystems Inc. ("Defendant") respectfully submits this letter to request that certain portions of its Proposed Findings of Fact and Conclusions of Law be filed under seal, pursuant to this Court's Protective Order because they contain or reference information that is protected from disclosure by the attorney-client privilege. The proposed redactions to that document have been made on the version that was filed on the ECF system earlier today. [Dkt. 38.] An unredacted copy was emailed to Chambers and will be delivered to the Court tomorrow morning.

As Your Honor is aware, on November 22, 2019, Defendant filed a letter requesting that certain Declarations previously submitted to the Court also be filed under seal. We respectfully request that these proposed redactions be made as part of that application to seal.

Thank you for Your Honor's consideration.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ James S. Yu

James S. Yu

KEP

cc: All counsel of record (via ECF)